
UNITED STATES DISTRICT COURT
for the
WESTERN DISTRICT OF VIRGINIA, CHARLOTTESVILLE DIVISION

Plaintiff/Counter Defendant)	
)	
)	
v.)	Case No. 3:17-CV-00089 (NKM/JCH)
)	
Emily Gorcenski,)	
Kristopher Goad,)	
Defendants/Counter Claimants)	

***ERRATA to PARAGRAPH 32 OF AMENDED (FIRST) COUNTERCLAIMS
OF DEFENDANTS
EMILY GORCENSKI AND KRISTOPHER GOAD***

Defendants/Counter Claimants Emily Gorcenski and Kristopher Goad (collectively, "Defendants"), by counsel, state the following:

Defendants filed their amended counterclaims in this action pursuant to Rule 15(a)(1)(B) on March 20, 2018. Shortly after filing, Defendant Ms. Gorcenski noticed that counsel had incorrectly stated some of the facts alleged in Paragraph 39 of the Amended Counterclaims. Paragraph 39 of the Amended Counterclaims should read, in its entirety:

39. As the victim of a crime, and because of the fear instilled in Ms. Gorcenski by Plaintiff's conduct, after filing the criminal complaint against Plaintiff, Ms. Gorcenski worked with the University of Virginia Police Department victim-witness coordinator to seek, and obtain, a temporary protective order to prohibit Plaintiff from having any direct or indirect contact with Ms. Gorcenski. This temporary protective

order was in place through the November 9 preliminary hearing in Plaintiff's criminal case. At the November 9 preliminary hearing, the issue of whether to extend the temporary protective order into a protective order was put before the court. Ms. Gorcenski was unaware that this issue would be decided at the November 9 preliminary hearing or that she would be requested to produce evidence of this conduct at that hearing. Because of this, protective order was not extended on that date due to lack of evidence of the threat against Ms. Gorcenski. However, the conditions of Plaintiff's bail prohibit him from having any direct or indirect contact with Ms. Gorcenski or Mr. Goad.

Defendants respectfully request that the Court accept this correction, and incorporate the corrected Paragraph 39 as stated above into the Amended Counterclaims, as if fully set forth therein. A revised version of the Amended Counterclaims, incorporating this correction, is attached hereto.

Respectfully submitted,
EMILY GORCENSKI
KRISTOPHER GOAD
By Counsel

March 20 2018

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Counsel for Emily Gorcenski and Kristopher Goad

CERTIFICATE OF SERVICE

I, Pamela Starsia, hereby certify that on March 20, 2018, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Western District of Virginia by using the CM/ECF system. I certify that counsel for all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: March 20, 2018.

/s/ Pamela Starsia
Pamela Starsia